

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

INDIANA LABORERS PENSION FUND,
Individually And On Behalf of All Others
Similarly Situated,

Plaintiff,

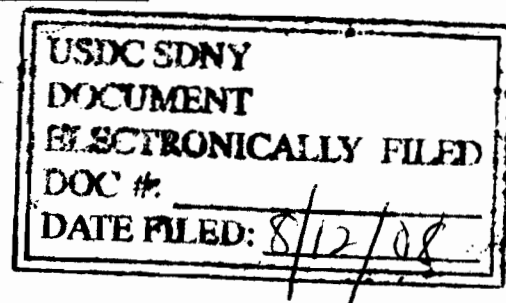
v.

FIMALAC, S.A., FITCH GROUP, INC.,
FITCH RATINGS, LTD., MARC
LADREIT DE LACHARRIÈRE,
STEPHEN W. JOYNT, and JOHN
SCHIAVETTA,

Defendants.

08 Civ. 5994 (SAS)

**STIPULATION AND
[PROPOSED] ORDER**



WHEREAS, plaintiff in the above-captioned action filed the Complaint for
Violation of Federal Securities Laws on July 1, 2008 (the "Complaint");

WHEREAS, on July 21, 2008, plaintiff served the Complaint on Fitch
Group, Inc. ("Fitch"), a defendant in this action; and

WHEREAS, the Complaint is governed by the provisions of the Private
Securities Litigation Reform Act ("PSLRA"), which, among other things, contains specific
provisions for consolidation and appointment of lead plaintiff in such actions;

IT IS HEREBY STIPULATED AND AGREED, by and between
undersigned counsel and subject to approval by the Court, that:

1. Defendant Fitch shall not be required to answer or otherwise respond to,
and is expressly relieved from answering or otherwise responding to, the Complaint.
2. Pursuant to the PSLRA, not later than forty-five (45) days after entry of
an order appointing lead plaintiff and lead plaintiff's counsel in the consolidated action

encompassing the above-captioned action, plaintiff(s) in the consolidated action shall serve and file a consolidated amended complaint that shall serve as the operative complaint, superseding the Complaint in this action.


3. Fitch shall move, answer or otherwise respond to the consolidated amended complaint not later than forty-five (45) days after service upon defendant's counsel of the consolidated amended complaint.

4. Plaintiffs in the consolidated action shall have forty-five (45) days to file a response to any motion to dismiss filed by Fitch, and Fitch shall have thirty (30) days to file a reply brief in support of its motion.

There have been no prior requests for an extension of time in this matter.

August 11, 2008

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August 11, 2008

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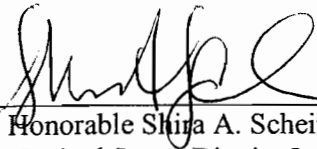
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Attorneys for Plaintiff

SO ORDERED:



Honorable Shira A. Scheindlin
United States District Judge